

UNITED STATES DISTRICT COURT

FOR THE

DISTRICT OF VERMONT

MARY and RICHARD HOULE,
Plaintiffs

v.

THE STANDARD FIRE INSURANCE
COMPANY and FEDERAL EMERGENCY,
MANAGEMENT AGENCY,
Defendants

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) Docket No. 2:13-cv-44
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STIPULATED DISCOVERY SCHEDULE/ORDER

The parties submit the following Discovery Schedule pursuant to Local Rule 26(a)(3):

1. The parties shall serve initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before August 29, 2013.

2. The parties shall serve all interrogatories and requests for production on or before November 29, 2013.

3. Depositions of all non-expert witnesses shall be completed by January 29, 2014.

4. Plaintiff shall submit expert witness reports on or before February 28, 2014.

Depositions of plaintiff's expert witnesses shall be completed by March 28, 2014.

5. Defendant shall submit expert witness reports on or before March 28, 2014.

Depositions of defendant's expert witnesses shall be completed by April 25, 2014.

6. The Early Neutral Evaluation session shall be conducted on _____
at _____.m.

The parties have agreed that _____ will serve as the early neutral evaluator.

Because Standard Fire is a fiscal agent of the United States and is subject to the National Flood Insurance Program ("NFIP") requirements imposed by federal statute and by the Federal Emergency Management Agency ("FEMA"), and because FEMA has reserved to itself the exclusive authority to waive NFIP requirements, (see 44 C.F.R. Pt. 61.13(d), and Pt. 62.23(k), as well as 44 C.F.R. Pt. 61, App. A(1), Art. VII(D)), Standard Fire has no settlement authority and the parties have agreed not to participate in ENE.

7. The parties shall serve all requests for admission on or before November 29, 2013.

8. All discovery shall be completed by January 29, 2014 (no later than 8 months after filing of the Answer or Third-Party Answer).

9. Motions for joinder of parties and amendments to the pleadings shall be filed on or before August 29, 2013.

10. Motions, including summary judgment motions but excluding motions relating to the conduct of the trial, shall be filed on or before May 30, 2014.

11. This case shall be ready for trial by July 31, 2014.

August 5, 2013
Date

/s/ Margaret Frye
Counsel for Plaintiff(s)

August 5, 2013
Date

/s/ Matthew B. Byrne
Counsel for Defendant(s)

APPROVED and SO ORDERED:

U.S. District/Magistrate Judge

Date: _____